is that of *Rivers* v. *Yazoo etc R. Co.*, 90 Miss. 196, 43 So. 471, that the corporation is liable for the agent's slander spoken while acting within the scope of his employment, and in the actual performance of the duties of the corporation touching the matter in question. Or as the Montana court holds, in *Grorud* v. *Lossl*, 48 Mont. 274, 136 Pac. 1069, in speaking of an act by the agent within the apparent scope of his authority: "and if the act is prompted by fraudulent or malicious motives, the agent's fraud or malice is imputable to the corporation."

CRIMINAL LAW—INFORMATION CHARGING STATUTORY OFFENSE IN TERMS OF STATUTE.—An information charged the accused with committing "the acts technically known as fellatio" made a felony by the California Penal Code of 1915. The defendant was convicted and sentenced to imprisonment. *Held*, that the judgment should be reversed on the ground that "'the acts constituting the offense' were not charged in such a manner as to enable 'a person of common understanding to know what is intended.'" *People* v. *Carrell* (Cal. 1917), 161 Pac. 995.

As a general rule, offenses proscribed and defined by a statute must be charged in the language of the statute, or in language equivalent thereto. *Jackson* v. *State*, 26 Fla. 510, 7 So. 862; *State* v. *Stubbs*, 108 N. C. 774, 13 S. E. 90; *Franklin* v. *State*, 108 Ind. 47; 22 CYC. 336; 11 L. R. A. 530 note. If the statute itself enumerates every ingredient of the offense, then an indictment describing a statutory offense in the very words of the statute is ordinarily sufficient. BEALE, CRIMINAL PLEADING AND PRACTICE, §197; *Pounds* v. *United States*, 171 U. S. 35; *People* v. *Paquin*, 74 Mich. 34, 41 N. W. 852; *State v. Whalen*, 98 Iowa 662, 68 N. W. 554; *State* v. *Bierce*, 27 Conn. 318. In *State* v. *Whalen*, supra, the court sustained a conviction under an indictment, which, following the wording of the statute, charged the accused with "seducing" a certain female. Neither the statute nor the information defined the word "seduce." The conclusion was put upon the ground that "seducing" included all the elements of the offense meant to be charged, and sufficiently informed the accused of the crime alleged. The decision in *State* v. *Bierce* announced the same rule for a similar state of facts. The exceptions to the rule as set forth above are, for the most part, cases in which the words of the statute have a technical legal meaning different from their common meaning. The oddity of the principal case lies in the fact that the Victorian modesty of the legislature has led them to define the crime by a term which has no common meaning, which is not found in any English dictionary, law or lay, and which remains somewhat ambiguous even after reference to the Latin authorities.

EQUITY—CLEAN HANDS.—In order to defeat a judgment in an anticipated suit for divorce and alimony, plaintiff, without consideration, deeded a parcel of land to his mother. He thereafter regained possession of the land and sued her to quiet title. *Held*, plaintiff did not come into court with clean hands, and relief should be denied. *Palmer* v. *Palmer* (Neb. 1917), 161 N. W. 277.